

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA**

JANE DOE; PROJECT SOUTH: THE)
INSTITUTE FOR THE ELIMINATION OF)
POVERTY AND GENOCIDE; and AL OTRO)
LADO, INC.)

Plaintiffs,

v.

U. S. IMMIGRATION AND CUSTOMS)
ENFORCEMENT; U.S. DEPARTMENT OF)
HOMELAND SECURITY; U.S.)
DEPARTMENT OF HOMELAND)
SECURITY – OFFICE FOR CIVIL RIGHTS)
AND CIVIL LIBERTIES; U.S.)
DEPARTMENT OF HOMELAND)
SECURITY – OFFICE OF THE INSPECTOR)
GENERAL; and U.S. DEPARTMENT OF)
HOMELAND SECURITY – OFFICE OF)
THE SECRETARY,)

No.: 1:23-cv-03205-SEG

Defendants.

NOTICE OF WITHDRAWAL OF COUNSEL

COMES NOW the undersigned counsel for Plaintiffs JANE DOE;
PROJECT SOUTH: THE INSTITUTE FOR THE ELIMINATION OF POVERTY
AND GENOCIDE; and AL OTRO LADO, INC., (“Plaintiffs”), and pursuant to
LR 83.1, requests that Pooja Mehta be withdrawal as counsel for Plaintiffs.
Plaintiffs will remain represented by attorneys at Grant & Eisenhofer P.A., Owings

Macnorlin, LLC, Al Otro Lado, Inc., and Project South, including, Barbara Hart, Irene R. Lax, Sarah Owings, Andrew Fels, and Azadeh Shahshahani.

Dated: August 23, 2023

Respectfully submitted,

/s/ Barbara Hart

GRANT & EISENHOFER P.A.

Barbara Hart (*pro hac vice*)

Irene R. Lax (*pro hac vice*)

Grant & Eisenhofer P.A.

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AL OTRO LADO, INC.

Andrew Fels (*pro hac vice*)

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PROJECT SOUTH

Azadeh Shahshahani (GA Bar No. 509008)

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Attorneys for Plaintiffs

CERTIFICATE OF COMPLIANCE WITH LR 5.1 (C)

This is to certify that the foregoing document was prepared using Times
New Roman 14 point font in accordance with LR 5.1 (C).

Dated: August 23, 2023

/s/ Barbara hart

CERTIFICATE OF SERVICE

The Undersigned hereby certifies that I have electronically filed the above document with the Clerk of the Court using CM/ECF which will send electronic notification of such filing to all registered counsel.

Dated: August 23, 2023

/s/ Barbara Hart

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Defendants.

**CERTIFICATE OF CONSENT FOR POOJA MEHTA TO WITHDRAW AS
COUNSEL FOR PLAINTIFF JANE DOE, et al.**

COMES NOW the undersigned Pooja Mehta and pursuant to Local rule 83,1 (E) of the Civil Local Rules of Practice for the United States District Court for the Northern District of Georgia, files this Certificate of Consent for the above mentioned attorney to withdraw as counsel for Plaintiffs JANE DOE; PROJECT SOUTH: THE INSTITUTE FOR THE ELIMINATION OF POVERTY AND GENOCIDE; and AL OTRO LADO, INC., (“Plaintiffs”), in this action.

As evidenced by the signatures of Andrew Fels and Azadeh Shahshahani below, Plaintiffs consent to the requested withdrawal.

Dated: August 23, 2023

Respectfully submitted,

/s/ Barbara Hart

GRANT & EISENHOFER P.A.

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Irene R. Lax (*pro hac vice*)

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/s/ Sarah Owings

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/s/ Andrew Fels

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/s/ Barbara Hart